



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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ATTORNEY GENERAL

DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

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January 14, 2020

**BY ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

*Paul G. Gardephe*  
**Paul G. Gardephe, U.S.D.J.**

*The conference is adjourned  
to April 9, 2020 at  
11:15 A.M.*

Re: Leckie v. City of New York, 19 CIV. 6719 (PGG)

*Dated: Jan. 20, 2020*

Dear Judge Gardephe:

The Office of the Attorney General has received a request for representation from Rakib in the above-captioned action. I write to respectfully request, with the consent of the Plaintiff's and defendants' counsel from Heidell, Pittoni, Murphy & Bach, an extension of time for defendant Rakib to respond to the complaint until March 20, 2020.<sup>1</sup> We also respectfully request an adjournment of the initial pretrial conference scheduled for February 6, 2020 at 11:00 A.M. to a date after March 20, 2020.

The grounds for these requests are that we have not received requests for representation by Napoli and Laugio, and the Office needs time to complete necessary representation analysis in the case once we are in receipt of such requests. Further, the Office will require more time to obtain pertinent files and documents, contact defendants, investigate the allegations, and draft responsive papers.

<sup>1</sup> Currently, Rakib's answer is due on January 20, 2020, although there is currently no response date reflected in the docket. Defendants Napoli and Laugio have not requested representation from this Office and we have not yet been able to confirm that they were effectively served.

There have been no prior requests for an extension of defendant Rakib's time to answer and the Court previously granted Plaintiff's request to adjourn the conference (Dkt. No. 52), and it will not affect any other dates in this matter. We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Julinda Dawkins  
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SDNY Admission Pending

Cc: All counsels via ECF